

**IN THE MATTER OF the *Ontario Energy Board Act, 1998, S.O. 1998, c.O.15, Sch. B;***

**AND IN THE MATTER OF an Applications by  
Oshawa PUC Networks Inc. for an Order or Order  
setting just and reasonable rates commencing May  
1, 2009.**

**INTERROGATORIES  
OF THE  
SCHOOL ENERGY COALITION**

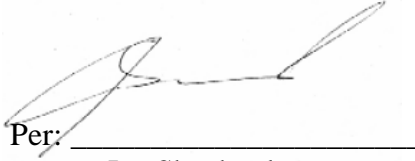
**Incremental Capital Application**

1. [p. 3] Please file the full capital budget for 2009 of \$11,803,824, using the Applicant's normal categories of capital spending, and a list providing details of all projects over the materiality threshold. In that list of projects, please identify
  - a. All projects that were excluded as "discretionary",
  - b. All projects that were excluded as "included in our approved rate base",
  - c. All projects that are considered incremental capital spending by the utility, and
  - d. All projects that are included in the budget and not included in any of the preceding three sub-lists.
2. [p. 3] Please file the capital budget, and the actual spending, using the Applicant's same normal categories, for each of 2005 through 2008. If there are increases in any year, in any category, exceeding 5% relative to the previous year, please provide an explanation of each of those increases.
3. [p. 5] Please provide the report of the internal investigation results from December 2008 relating to concrete poles.
4. [p. 6] Please provide the actual cost to replace concrete poles in each year from 2005 through 2008, broken down into engineering, purchase cost, installation, removal and disposal, overhead allocation, and any other material categories. Please advise the number of concrete poles replaced in each of those years. Please advise what percentage of such costs in each year were costs of internal resources, and what percentage were externally contracted.

5. [p. 7] Please detail what maintenance projects would be postponed if required to address the concrete pole replacement, and the revenue requirement impact of that postponement. Please explain how postponing maintenance would facilitate this replacement program, when the intention is to tender the work to outside contractors. Please explain how “workforce limitations” impact a project that is to be tendered.
6. [p. 8] Please advise what amount is already included in the utility’s 2008 budget for the LTLT projects for 7 customers scheduled for that year.
7. [p. 10] Please provide the report or analysis that identifies “a number of distribution feeders with substandard reliability”. Please compare the reliability indices of the utility overall with industry averages, and identify the connection between these substandard feeders and poor reliability performance by the utility. Please describe how the project to upgrade this particular feeder differs from normal remedial work on the Applicant’s distribution system. Please provide a chart showing the reliability driven capital spending of the Applicant for each of the years 1999 to 2008 inclusive, and describe any material projects included in the spending in each of those years.
8. [p. 13] Please advise why the mobile workforce project should not be considered to be a productivity investment of the type that is expected by utilities during their IRM period. Please provide the business case for this project. If not included in the business case, please identify the capital and O&M spending impacts year by year from the time of commencing the project until benefits have been fully realized, and convert each of those capital and O&M spending impacts into the revenue requirement impact for each year (calculated on a cost of service basis).

Respectfully submitted on behalf of the School Energy Coalition this 5<sup>th</sup> day of February, 2009

**SHIBLEY RIGHTON LLP**



Per: \_\_\_\_\_  
Jay Shepherd